

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MINNESOTA**

JAMF SOFTWARE, LLC, a corporation

Plaintiff,

vs.

PRAKASH MAHARAJ, an individual and
KANDJI, INC., a corporation.

Defendants.

Case No.

PLAINTIFF’S MOTION FOR A TEMPORARY RESTRAINING ORDER

Plaintiff Jamf Software, LLC (“Plaintiff” or “Jamf”), by and through its undersigned counsel, hereby moves for a temporary restraining order containing the provisions set forth below. In support of its motion, Plaintiff incorporates its supporting Memorandum of Law and supporting Declarations, which set forth in detail that:

1. Plaintiff respectfully moves for a temporary restraining order that: (a) requires Defendants Prakash Maharaj (“Maharaj”) and Kandji, Inc. (“Kandji”) (collectively, “Defendants”), to return and disgorge all Jamf documents and information in their possession and that restrains and enjoins Defendants from continuing to use any documents or information misappropriated from Jamf; (b) requires Defendant Maharaj to comply with his post-relationship contractual obligations to Jamf, including but not limited to an injunction prohibiting Defendant Maharaj from soliciting Jamf clients while in possession of Jamf’s confidential and proprietary trade secrets information in violation of his Service Agreement and Non-Disclosure Agreement and prohibits Defendant Kandji from interfering with Defendant Maharaj’s obligations to Jamf; (d) compels Defendants to produce all work computers, cellular phones, USB drives, thumb drives, disks, external hard drives, or any other electronic storage devices or systems which Defendants

have utilized at any from June 2023 to the present (the “Electronic Media”); (d) compels Defendants to produce their Electronic Media to a computer forensics expert identified by Jamf to conduct an appropriate search and forensic review of those devices; (e) orders that discovery immediately commence and be conducted on an expedited basis; (f) requires Defendants to account for and return all Jamf trade secrets and confidential information in their possession, custody, or control, and to certify that they have returned to Jamf all of Jamf’s trade secrets and confidential information in their possession, custody, or control; (g) requires Defendants to provide an accounting of all revenues and profits derived from, facilitated by, or obtained by each of them, directly or indirectly, as a result of Defendants’ misappropriation of Jamf’s trade secrets and confidential information; and (h) any other such relief as this Court deems just and proper.

2. Plaintiff is likely to succeed on the merits of its breach of contract, tort claims, as well as its claims asserted under the Defendant Trade Secrets Act for misappropriation and use of Jamf’s trade secrets. Plaintiff has no adequate remedy at law and will suffer immediate and irreparable harm absent emergency relief.

3. The relief sought through this motion will not cause undue hardship on Defendants and will only require them to abide by their contractual, statutory, and common law obligations. The relative balance of harms weighs heavily in favor of granting the requested relief and the entry of the temporary restraining order will serve the public interest.

4. Due to the immediate and irreparable harm Plaintiff will suffer absent emergency relief, Plaintiff requests expedited handling of this motion.

This motion is made pursuant to Federal Rule of Civil Procedure 65(b) and based upon the Memorandum of Law and accompanying evidence filed simultaneously herewith, any further

evidence and argument to be presented at or before the hearing, and all of the files, records, and proceedings herein.

Dated: August 17, 2023.

/s/ Andrew D. Moran

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